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11 ANDREW BAHMANYAR

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 DANIEL KEATING-TRAYNOR on  
16 behalf of himself and all others similarly  
17 situated,

18 Plaintiff,

19 v.

20 AC SQUARE; COMCAST INC.; AFSHIN  
21 GHANEH; ANDREW BAHMANYAR;  
22 and DOES 1 THROUGH 60, inclusive,

23 Defendant.

Case No. CV-08-3035-MHP

**[PROPOSED] ORDER GRANTING  
DEFENDANT AC SQUARE, INC., AFSHIN  
GHANEH AND ANDREW  
BAHMANYAR'S MOTION FOR  
SANCTIONS UNDER FRCP RULE 11 & 28  
U.S.C. 1927**

**FRCP, RULE 11; 28 U.S.C. § 1927**

**Date: October 20, 2008**

**Time: 2:00 p.m.**

**Dept: Courtroom 15**

**Judge: Honorable Marilyn H. Patel**

24 Defendants AC Square, Inc., Afshin Ghaneh and Andrew Bahmanyar (hereinafter  
25 referred to as "Defendants") Motion for Sanctions under FRCP Rule 11 and 28 U.S.C. Section 1927  
26 came on regularly for hearing before this Court on August 25, 2008. Ronald A. Peters, Esq.  
27 appeared as attorney for Defendants. Daniel Berko appeared as attorney for plaintiff, Daniel  
28 Keating-Traynor. After considering the moving papers, the papers submitted in opposition to the  
motion, the papers submitted in reply to the opposition, arguments of counsel and all other matters  
presented to the Court, IT IS HEREBY ORDERED THAT, the motion is GRANTED. Plaintiff's  
Counsel of Record is hereby Ordered to pay to Defendants' counsel, the law firm of Littler  
Mendelson, the sum of \$45,756.13 as reasonable sanctions for filing and pursuing this action in

(NO. CV-08-3035-MHP)  
FIRMWIDE:86529631.1 047098.1008

**[PROPOSED] ORDER GRANTING  
DEFENDANTS' MOTION FOR SANCTIONS,  
FRCP RULE 11; 28 U.S.C. § 1927**

1 violation of Federal Rule of Civil Procedure, Rule 11 and 29 U.S.C. Section 1927. Said sanctions  
2 shall be paid within 30 days of the date of this Order.

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4 Dated: \_\_\_\_\_

5 Honorable Marilyn H. Patel  
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